RCRA COMPLIANCE EVALUATION INSPECTION

Brooklyn Union Company
287 Maspeth Avenue
Brooklyn, New York

NYD006978795

April 16, 1987

Participating Personnel:

U.S. Environmental Protection Agency
Nick Magriples, Environmental Engineer
Louis DiGuardia, Geologist

Brooklyn Union Gas Company
Katherine Hartnett, Environmental Engineer

Report Prepared by:

Nick Magriples 6/5/87
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Source Monitoring Section

Approved for the Director by:

RECEIVED
JUN 16 1987

6/11/87
Richard D. Spear, Chief
Surveillance and Monitoring Branch

Summary of Findings

Purpose of Survey

A RCRA compliance evaluation inspection was conducted at Brooklyn Union Gas Company - Greenpoint Energy Facility, Brooklyn, New York on April 16, 1987. The scope of this inspection was comprehensive including a record review and a site survey. Records maintained for all of the Brooklyn Union sites at Montague Street in Brooklyn were also inspected. This inspection was requested by the Hazardous Waste Compliance Branch inorder to determine compliance with all applicable RCRA regulations.

Facility Description and Operations

The Greenpoint Energy Facility is Brooklyn Union Gas Company's main storage, distribution and production facility. The facility includes a plant that converts naptha to natural gas (SNG), a heated tank where liquid natural gas is vaporized (LNG), two natural gas storage tanks, and two gate stations (Maspeth and Varick). The SNG plant is no longer under operation. The suppliers of natural gas to Brooklyn Union are Texas-Eastern, Tennesee Gas, and Transco.

Brooklyn Union Gas also maintains other distribution system holders, gates stations. The other holders (natural gas storage tanks) are located in Queens on 79th Street and Grand Avenue.

Above ground gate stations contain pressure regulating equipment necessary for the flow of natural gas to the public. The following is a list of those gate stations which contain a scrubber and a condensate tank:

Spring Creek	745-757 Montauk Avenue
Maspeth/Varick	287 Maspeth Avenue, Brooklyn
Cambria Heights	116th Avenue and 208th Street, Queens
Canarsie	East 83rd St. and Ditmas Avenue, Brooklyn
Citizens	2nd Avenue and 6th Street, Brooklyn
Mariners Harbor	1957 Forest Avenue, Staten Island
Van Wyck	135-16 116th Avenue, Queens
Bay Ridge	820-884 65th Avenue, Brooklyn
Kennedy	Intersection West Hanger Road and Service Road at Marriott Hot Shoppe
Narrows	End of New Lane at New York Bay

The following is a list of those gate stations which do not contain a scrubber or condensate tanks:

Gravesend	20-86 McDonald Avenue, Brooklyn
Grasmere	465 Mosel Avenue, Staten Island
Clifton	Willow Avenue and Bay Street, Staten Island
LaGuardia	Under approaching ramp to Maintenance Building., East of Parking
Staten Island	Bl[illegible]ing [illegible]le and Arthur Kill Roads
Fresh Kills Landfill, Staten Island	Muldoon Avenue and Veterans Road West, Staten Island

Mini-gate stations and interface (I.F.) regulator stations contain pressure regulating and electronic equipment in metal sidewalk-curbside locked cubicles. The following is a list of these stations which do not contain a scrubber and a condensate tank:

Brooklyn Area

Belmont Gate Station
Belmont and Snediker Avenues

Bensonhurt Gate Station
62nd Street and 15th Avenue

Facilities - 60 psig Interconnection
Calyer Street and McGuiness Boulevard

North Brooklyn Gate Station
Quincy Street and Franklin Avenue

Sheepshead Bay Gate Station
Bedford Avenue and Avenue X

Flatbush Gate Station
New York and Snyder Avenues

Coney Island Gate Station
Shell Road and Neptune Avenue

I.F. #2 Regulator Station
Scholes St. and Porter Avenue

I.F. #3 Regulator Station
Ingraham St. and Porter Avenue

I.F. #4 Regulator Station
Calyer and Eckford Streets

I.F. #5 Regulator Station
Fountain and Flatlands Avenue

I.F. #6 Regulator Station
East 86th Street and Flatlands Avenue

Queens Area

Jamaica Gate Station
173rd Street and Liberty Avenue

Bowery Bay Gate Station
21st Avenue and 75th Street

I.F.#1 Regulator Station
95th Street and Astoria Boulevard

Waste Generation

Hazardous waste is generated at the Greenpoint facility as a result of: 1) PCB - contaminated hydrocarbon condensates; and 2) various chemicals used as a part of gas production processes or field maintenance activities. All of the waste generated at the Greenpoint facility, as well as all of the other Brooklyn Union Facilties, is manifested from the main office at Montague Street under the EPA I.D. number of NYD006978795.

The natural gas transported through Brooklyn Union's distribution system is entrained with a liquid condensate made up of hydrocarbons and water. This condensate is collected in underground holding tanks at the two gate stations located at the Greenpoint facility - Maspeth and Varick (condensate is also removed at nine other gate stations located throughout the system, see chart on previous page). Due to the physical properties of the hydrocarbons and the water, seperation occurs in the tank and the water is able to be removed prior to the hydrocarbon collection.

According to the facility representative, the water phase consistently demonstrates no PCB contamination. The water is then pumped into an oil seperator (water from the other nine gate stations is brought to the Greenpoint facility), from which it flows into the sanitary sewer. The oil from the seperator is pumped to the naptha storage area. All collected batches of hydrocarbon are tested prior to removal from the underground tanks. If the PCB concentration is greater than 50 ppm, the condensate is considered hazardous, and transported via Cecos to ENSCO, a licensed incinerator in El Dorado, Arkansas. If the PCB concentration in the gas condensate is less than 50 ppm (non-hazardous), the material is burned as high quality fuel at the Greenpoint Facility. The total quantity of PCB contaminated gas condensate manifested from all of the Brooklyn Union facilties in the past several years is as follows:

1984 - 7.6 tons
1985 - 9.0 tons
1986 - 1.6 tons

Logs are maintained for each gate station, which include; the location of condensate tanks, the "running" volume in the tank, if and when a sample was taken, the analytical results, the laboratory which conducted the analysis, and the date of disposal.

Other hazardous materals handled or generated as part of Greenpoint's gas production processes or field maintenance activities include the following: PCB contaminated laboratory waste, waste petroleum naptha, mercury contaminated gas regulators, mastic, vanadium pentoxide, and corrosive liquids. PCB contaminated laboratory wastes are generated at the Greenpoint Laboratory. The waste is stored in a drum kept outside of the laboratory building in a fenced off area. When the drum has been filled, it is taken to the main waste storage area, where it is held for pickup by the licensed transporter, and disposed of by CECOS International. The amount generated yearly varies, however it is a small enough quantity so that Brooklyn Union has difficulty in having the disposal facility pickup within the 90-day generator storage limit. It is also company policy not to deal with waste brokers. Waste petroleum naptha is generated as a dirty parts cleaner. Sixteen drums of this waste material (D001) was manifested to Safety Kleen for recycling in 1986. Mercury contaminated gas regulators are disposed of as these instruments are removed from the field. The small amount of mercury present in the regulator is recovered for processing, and the equipment itself is disposed of as mercury contaminated to CECOS International. In 1986 one ton of this material was generated. Mastic is generated from pipe covering removal (asphalt residue). Removal of this waste material is conducted by a licensed contractor. Two drums were generated in 1986. Corrosive liquids are generated from meter wash cleaning tanks. Twenty-eight drums were generated last year and disposed of at CECOS. This waste is no longer generated since the meters are brought to an outside cleaner for the service. Vanadium pentoxide is a corrosion inhibitor used in the piping for the CO_2 removal system of the SNG plant. The waste generated is the drum which held the vanadium pentoxide, and any residue remaining inside of it. The empty drum is not rinsed or cleaned, and is handled as hazardous waste. Five of these drums were generated in 1986. Due to the SNG plant no longer being in operation, this type of waste will no longer be generated.

At the time of this inspection, the following hazardous wastes were being stored on-site:

5 (emtpy) drums contaminated with vanadium pentoxide - ✱
1 drum of mercury contaminated wastes
4 drums of PCB solid waste

Findings and Conclusions

The following problems were noted during the inspection of Brooklyn Union Gas Company's Greenpoint Facility and the records maintained in the main office at Montague Street:

1) Facility records indicate that hazardous waste is stored at the Greenpoint Facility for periods greater than 90 days: 373-1.1 (d)(i)(iii). According to the facility representative, due to small amount of waste generated by Brooklyn Union Gas (aside from the PCB contaminated condensate), it is difficult to have a carrier take away the waste. It is also company policy not to use waste brokers.

   The empty drums of vanadium pentoxide and the drum of mercury contaminated wastes have been in the storage area for over eight months according to the waste log. Vanadium pentoxide in this form (not a triple rinsed container) is considered an acutely hazardous waste. ✱

2) Labels are not placed on the accumulated drums indicating that the waste is hazardous. Also there isn't a sign at the storage area indicating the presence of hazardous waste. The sign currently used at the storage area states; Caution: Regulated Materials - Keep Out, 373-1.1 (d)(1)(iii)(c)(3).

   An inspection by the N.Y.D.E.C. on December 17, 1985 revealed the same deficiency.

3) The date on which each period of accumulation begins is not marked on each container of hazardous waste, 373-1.1(d)(1)(iii)(c)(2).

   This deficiency was also revealed at the same inspection as indicated above.

4) Labels are not placed on the containers used to accumulate hazardous waste outside of the laboratory (point of generation), 372.2(a)(8)(i)(a)(2).

5) The containers of hazardous waste generated in excess of the amount allowed in 372.2(a)(8)(i)(a), at the point of generation, are not marked with the date of accumulation, 372.2(a)(8)(i)(b).

Recommendations

Appropriate actions should be taken to ensure compliance with all applicable regulations. ✱

47-15-14(9/86)

INSPECTION FORM

REGION: 2
Major:
Major TSDF:
Non-Major: X
Substitution:

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT
Chapter 639, Laws of 1978

Prepared for:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Henry G. Williams, Commissioner

Division of Solid and Hazardous Waste
Norman H. Nosenchuck, Director

Send to: Compliance Inspection Section
50 Wolf Road - Room 209/415
Albany, New York 12233-0001

EPA I.D. NUMBER: NYD006978795

*HANDLER'S NAME (Corporate): BROOKLYN UNION GAS COMPANY

(Division): GREENPOINT ENERGY FACILITY

*HANDLER'S MAILING ADDRESS: 287 MASPETH AVENUE

City, State & Zip Code BROOKLYN, NEW YORK 11222

*HANDLER'S LOCATION ADDRESS: (if different than mailing)

City, State & Zip Code

*HANDLER'S TELEPHONE NUMBER: ( ) Extension:

*FULL NAME OF HANDLER'S CONTACT: (~~Mr.~~) (Ms.) Katherine Hartnett

*SIGNATURE OF HANDLER'S CONTACT:
(This signature is not an admittance to any violations cited herein. It merely acknowledges that an inspection took place.)

*TITLE OF HANDLER'S CONTACT: Environmental Engineer

INSPECTION DATE: 4 / 16 / 1987 TIME OF INSPECTION: 10:00 (a.m.) (~~p.m.~~)

INSPECTOR'S SIGNATURE: Nick Magriples

COUNTY: KINGS E/A NUMBER: ___ ___ . ___ ___ ___

INSPECTOR'S NAME: Nick Magriples

TITLE: Environmental Engineer

NAME: Louis DiGuardia

TITLE: Geologist

CHECK ONE: Copy of THIS report (___ has) (X has not) been given to the Handler.

REPORT PREPARED BY: Nick Magriples DATE: 5/5/87

REPORT APPROVED BY: DATE:

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(Need Not Attach If Not Required - Circle Attached Appendices)

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* For the purpose of this Inspection Report - HANDLER means a hazardous waste Generator, Transporter, Treatment, Storage or Disposal Facility (TSDF).

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
50 Wolf Road, Albany, New York 12233

PART I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 371	Yes	No
A. Is there reason to believe the facility has hazardous waste on-site? If yes, what leads you to believe it is hazardous waste? Check appropriate box/boxes and attach any applicable correspondence with DEC or EPA:	X	

(1) X Company recognizes that its waste is hazardous during the inspection.

(2) X Company admitted the waste is hazardous in its RCRA notification and/or Part A permit application.

(3) NA Testing has shown characteristics of:
( ) ignitability - 371.3(b);
( ) corrosivity - 371.3(c);
( ) reactivity - 371.3(d);
( ) EP toxicity - 371.3(e)

NA Has revealed hazardous constituents (please attach analysis report) 371.4(a)(2), Appendix 22, Appendix 23

(4) NA The material is listed in the regulations as a hazardous waste from non-specific sources 371.4(b).

(5) NA The waste material is listed in the regulations as a hazardous waste from specific sources. 371.4(c).

(6) X The material or product is listed in the regulations as discarded commercial chemical products, off-specification species, container residues and spill residues thereof. 371.4(d).

(7) NA Company is unsure, but they have reason to believe that waste materials are hazardous. (Explain) _____

_____

_____

_____

_____

B. Is there reason, other than those above, for you to believe that there is hazardous waste on site? (Explain) _____

371.4(e) - PCB wastes

C. What other environmental permits are held by the company, relative to hazardous waste management?

NA SPDES Permit Number X Air Permit Number

NA Part 364 Industrial Waste Transporter Permit (indicate this company's permit number if any)

Please describe other relavent (if any) permits and give the name, address, Part 364 Permit Number and EPA I.D. Number of transporter(s) used by company.

D. If the facility is a treatment, storage or disposal facility, have they:

NA Submitted a Part A application. NA Have changes been made that are not reflected in the Part A application? Should the Part A be modified by the Company? ____ If so, explain.

NA

NA Submitted a Part B application.

NA Been granted a Part 373 permit.

If so, when does it expire: NA
Please attach or explain any special conditions or variances - 373-1.1(e) _____

NA Been granted a hazardous waste Part B permit.

If so, also complete Appendix M.

E. Describe the activities that result in the generation of hazardous waste. Include the company's manufacturing processes. —

—See attached report—

F. Identify the hazardous wastes that are on-site and the quantity of each (use the identification numbers referred to in Part 371).

—See attached report—

G. The handler notified EPA as a:

Generator

Has EPA or DEC officially modified the handlers status? If so, attach correspondence. NA

2. Status Identification:

This handler should be inspected as a (check each appropriate category after considering exemptions)

A. NA Transporter - complete Appendix B

B. Generator Status Identification 372.1

1. NA Category 1 generator - small quantity generator - generates less than 100 kg/mo and stores less than 100 kg. - 372.1(e)(1)(vii)(a) Complete Part II, 1A.

2. NA Category 2 generator - small quantity generator - generates less than 100 kg/mo and stores more than 100 kg but less than 1,000 kg. - 372.1(e)(1)(vii)(b) - Complete Part II, 1B.

3. NA Category 3 generator - small quantity generator - generates more than 100 kg/mo but less than 1,000 kg/mo and stores less than 1,000 kg. - 372.1(e)(1)(viii) - Complete Part II, 1B and 1C.

4. X Category 5 generator - generated 1,000 kilograms or more per month or generated acute hazardous waste in quantities greater than those specified in Part 372.1(e)(1)(v). Complete Part II. Generators over sole source aquifers also complete Appendix A.

5. X Category 6 generator - stores 1,000 kilograms or more or stores acute hazardous waste in quantities greater than those specified in Part 372.1(e)(1)(v). Complete Part II. Generators over sole source aquifers also complete Appendix A.

C. Treatment, Storage or Disposal Facility Status

If yes, complete Appendix A and other appropriate Appendices.

1. Is hazardous waste generated and stored on-site? If so:

(a) Yes Has hazardous waste been stored on-site longer than 90 days? 373-1.1(d)(1)(iii)

(b) No Has more than 8,800 gallons of hazardous waste been stored in containers? 373-1.1(d)(iii)(a)

(c) No Has more than 20,000 gallons of hazardous waste been stored in tanks? 373-1.1(d)(iii)(b)

2. NO Hazardous waste received from off-site and not beneficially used, reused or legitimately recycled or stored.

3. NO Hazardous waste is treated on-site.

4. NO Hazardous waste is disposed of on-site.

3. Exemptions

A. Generator Exemptions

(1) NA Not a regulated handler (be sure to indicate why in Part I 1F and 1G and/or in appropriate exemption below - for example the company notified for precautionary reasons or the waste generated is not hazardous as specified in 371.1(e)(2).

(2) NA Delisted hazardous waste. IDENTIFY the waste that was delisted: (If the company is in the delisting process they are still regulated until their delisting petition is favorably approved) Complete appropriate parts depending on company status.

_____

_____

(3) NA Exemption for used engine lubricating oil. 372.1(e)(8) -

(4) NA Exemption for publicly owned treatment works 372.1(e)(4).

(5) NA Samples collected for testing. 372.1(e)(5).

(6) NA Residues of hazardous waste in empty containers. 372.1(e)(6).

(7) X A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials. 372.1(e)(7).

gas condensate pipeline - storage tank

B. TSD Exemptions

1. TSD exemptions - 373-1.1(d)(1) (for facilities and operations that manage hazardous waste other than waste oil)

(a) NA Storage of hazardous wastes indicated in 373-1.1(d)(4) prior to its beneficial use or reuse or legitimate recycling or reclamation. 373-1.1(d)(1)(vi). If yes, complete Part II, Questions 3, 5, 6, 7.

(b) NA Beneficial use or reuse or legitmate recycling or reclamation of a characteristic hazardous waste not identified in 373-1.1(d)(5) other than sludge. (373-1.1(d)(1)(vii)). Complete manifest questions.

(c) NA Beneficial use or reuse or legitimate recycling or reclamation of a listed hazardous waste or hazardous waste sludge other than at commercial facilities. Units utilized for precious metal recovery at commercial facilities are exempt. Recyclable materials listed in 373-1.1(d)(5) are not exempt. Any off-site facility must have an EPA identification number. (373-1.1(d)(1)(viii)) Complete manifest questions.

(d) NA The treatment of characteristic hazardous waste other than sludge prior to its beneficial use or reuse or legitimate recycling or reclamation. Recyclable materials listed in 373-1.1(d)(5) are not exempt. 373-1.1(d)(1)(ix). Complete manifest questions.

(e) NA The treatment of a listed hazardous waste or hazardous waste sludge prior to its beneficial use or reuse or legitimate recycling or reclamation other than at commercial facilities. Units utilized for precious metal recovery at commercial facilities are exempt. Any off-site facility must have an EPA identification number and comply with manifesting requirements. Recyclable materials listed in 373-1.1(d)(5) are not exempt. (373-1.1(d)(1)(x))

(f) NA Totally enclosed treatment facility (373-1.1(d)(1)(xi))

(g) NA Elementary neutralization units or wastewater treatment units other than units located at commercial facilities. Units utilized for precious metal recovery at commercial facilities are exempt. If yes, complete Part II, 3. (373-1.1(d)(1)(xii))

(h) NA A wastewater treatment facility holding a SPDES Permit for a surface water point source discharge that reuses spent pickle liquor or facilities that accumulate, store or physically, chemically or biologically treat spent pickle liquor prior to reuse in a wastewater treatment facility. (373-1.1(d)(1)(xvi))

2. TSD exemptions - 373.1.1 (d)(2) (for facilities and operations that manage waste oils)

(a) NA Storage or treatment of waste oil generated on-site prior to its beneficial use or reuse or legitimate recycling or reclamation if the waste oil is not a listed hazardous waste, and the waste oil is not a hazardous sludge. 373-1.1(d)(2)(ii). If yes, complete Part II: 3, 5, 6, 7.

(b) NA Exemptions for storage of waste oil at an energy recovery facility prior to its on-site combustion of such waste oils are not listed hazardous wastes, waste oils are not hazardous sludges, and the facility stored less than 80,000 gallons of waste oil. 373-1.1(d)(2)(iii). If yes, complete Part II: 3, 5, 6, 7.

(c) NA Combustion units that recover energy from waste oil, other than listed hazardous waste and sludges and the related treatment on-site of such combustion units.

3. TSD exemptions - (for facilities and operations that manage hazardous waste or waste oils).

(a) X Storage of hazardous waste generated and stored on-site for 90 days or less and 8,800 gallons or less is stored in containers or 20,000 gallons or less is stored in tanks. The facility cannot be located in a geographical area overlying a sole source aquifer. If yes, complete Part II. 373-1.1(d)(1)(iii).

* see report for explanation

(b) NA Storage or treatment of hazardous waste on-site of generation if generated and stored less than 1,000 kilograms of hazardous waste in each calendar month and do not generate or store acute hazardous waste as described in 373-1.1(d)(1)(i)(b). 373-1.1(d)(1)(v).

(c) NA Treatment or containment activities during an immediate response 373-1.1(d)(1)(xiii).

(d) NA Accumulation areas. If yes, complete Part II: 3C, questions 1-5. 373-1.1(d)(1)(xiv).

(e) NA Storage of manifested shipments of hazardous waste in containers or vehicles by a transporter at its own transfer facility for 5 days or less. If yes, complete Appendix B: 3. 373-1.1(d)(1)(xv).

4. Environmental Facilities Corporation (EFC) Survey

The following questions are voluntary:

The Environmental Facilities Corporation (EFC) is actively involved in the industrial materials recycling program, and these questions will assist EFC in carrying out this program. It may also be beneficial to the facility being inspected in that acceptable markets or more economical alternatives to the facility's current disposal techniques may be brought to their attention.

NA

A. Does the company believe their hazardous waste has the potential for recovery, reclamation or exchange with other companies to minimize disposal costs? ___Yes ___No ___Don't Know

If yes:

B. Does the company wish to list their waste stream in the Northeast Industrial Waste Exchange Listings Catalog? ___Yes ___No ___Don't Know

C. Does the company want to receive additional information about the potential for waste exchange? ___Yes ___No ___Don't Know

D. Does the company wish to obtain assistance from the New York State Environmental Facilities Corporation to assess the potential for recovery, reclamation or exchange of the hazardous waste stream? ___Yes ___No ___Don't Know

The Company representative may wish to contact Mr. Pickett Simpson, Hazardous Waste Program Manager, Environmental Facilities Corporation, 50 Wolf Road, Room 527, Albany, New York 12233 at (518) 457-4138.

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
Bureau of Hazardous Waste Operations
50 Wolf Road, Albany, New York 12233

Part II

Generator Inspection Section

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

Refer to questions based upon category checked in Part I.

1. Requirements for Category 1-3 Generators:

A. If Category 1, the generator has:

____ disposed of hazardous waste in a solid waste facility - 372.1(e)(1)((vii)(a)(2) ____

____ made a hazardous waste determination - 372.1(e)(1)(vii)(a)(1) ____

B. If Category 2 or 3, the generator has met the following:

____ made a hazardous waste determination - 372.1(e)(1)(vii)(b)(1) ____

____ disposed of in authorized hazardous waste facility - 372.1(e)(1)(vii)(b)(2) ____

____ used appropriate containers; properly packaged, labeled and marked during storage and shipment - 372.1(e)(1)(vii)(b)(4) ____

____ had containers and tanks stored properly; not open, not handled or stored in a way which may cause it to leak; inspected at least quarterly - 372.1(e)(1)(vii)(b)(5) ____

____ had tanks designed, constructed and operated in accordance with regulations - 372.1(e)(1)(vii)(b)(6) ____

____ had tanks properly sheltered and protected-372.1(e)(1)(vii)(b)(7) ____

C. If Category 3 generator, has:

____ annual report prepared and sent to DEC - 372.1(e)(1)(viii)(f) ____

____ obtained an EPA Identification Number - 372.1(e)(1)(viii)(b) ____

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

For Category 5 and 6 generators complete remainder of Part II.

2. General Requirement

A. ___ The generator has made a determination as to whether or not his solid waste is a hazardous waste - 372.2(a)(2) X

3. On-site accumulation of hazardous waste prior to shipment

A. X All such wastes are shipped off-site to an authorized treatment, storage or disposal (TSD) facility in 90 days or less. 372.2(a)(8)(ii) ___

B. X The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container or tank 372.2(a)(8)(ii) ___

C. Standards for management of containers - 372.2(a)(8)(ii); 373-3.9
(This section will also be completed for TSD's as referred to from Appendix A.)

1. What type of containers are used for accumulation? Describe the size, type. (e.g., 12 fifty-five gallon drums of waste acetone).

- See attached report -

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

2. X Each container is marked with the words "Hazardous Waste." 372.2(a)(8): 373-1.1(d)(1)(iii) ___

3. ___ The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b) X

4. ___ Hazardous waste is stored in containers made of compatible materials 373-3.9(c) (If not, please explain). X

5. ___ All containers except those in use are closed - 373-3.9(d)(1) X

6. ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the container or cause it to leak - 373-3.9(d)(2) X

7. ___ The storage area is inspected at least weekly - 373-3.9(e) X

8. The generator complies with the following special requirements related to storage of ignitable, or reactive wastes 373-3.9(f):

(a) ___ Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility property line. 373-3.9(f) X

(b) ___ Generator has taken precautions to prevent accidental ignition or reaction of ignitable or reactive waste - 373-3.2(h)(1) X

(c) ___ Generator has placed "No Smoking" signs conspicuously wherever there is a hazard from ignitable or reactive waste - 373-3.2(h)(1) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

9. The generator complies with the following special requirements related to incompatible wastes: 373-3.9(g)

(a) The storage of ignitable or reactive wastes, and the mixture or comingling of incompatible wastes, or incompatible wastes and materials, is conducted to prevent - 373-3.2(h)(2)

(1) ___ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i) NA

(2) ___ production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health - 373-3.2(h)(2)(ii) NA

(3) ___ production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii) NA

(4) ___ the damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv) NA

(5) ___ a threat to human health or the environment - 373-3.2(h)(2)(v) NA

(b) ___ Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material. 373-3.9(g)(2) NA

(c) ___ Hazardous waste in containers stored nearby incompatible waste or material is separated by the incompatible waste by a dike, berm, wall or other device. 373-3.9(g)(3). NA

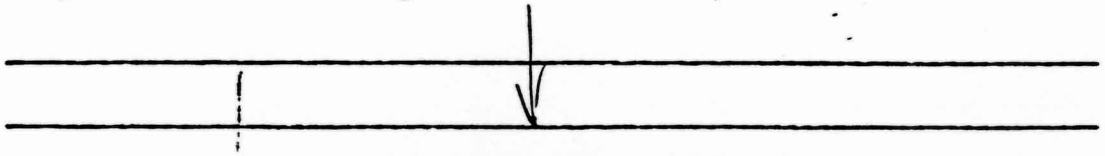
D. Standards for management of tanks - 372.2(a)(8)(ii); 373-3.10

1. What are the approximate number and size of tanks containing hazardous waste?

NA

Tank considered is part of the raw material pipeline (storage) - exempt

2. Identify the waste treated/stored in each tank. Include whether they are above or below ground.



3. ___ Each tank is marked with the words "Hazardous Waste" ___

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

Tank General Operating Requirements - 373-3.10(b)

4. ____ Hazardous wastes or treatment reagents are not placed in a tank, if they could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life - 373-3.10(b)(2). If so, please explain. NA

5. ____ Uncovered tanks have at least 60 centimeters (2 feet) of freeboard or an adequate containment structure - 373-3.10(b)(3)

6. ____ Where waste is continuously fed into a tank, the tank must be equipped with a means to stop the inflow (e.g., bypass system to a standby tank or a waste feed cutoff system) - 373-3.10(b)(4)

Tank Waste Analysis - 373-3.10(c)

7. ____ There is a waste analysis plan if tank is to be used to chemically treat or store a hazardous waste substantially different from the previous waste, or if a different process is used from the previous process. (Complete Appendix A, Number 4).

Tank Inspections - 373-3.10(d)

8. Tank(s) are inspected each operating day for:

   (A) ____ discharge control equipment (e.g., waste feed cutoff systems, bypass systems and drainage systems) - 373-3.10(d)(1)(i)

   (B) ____ monitoring equipment (e.g., pressure and temperature gauges) - 373-3.10(d)(1)(ii)

   (C) ____ level of waste in tank to ensure proper freeboard - 373-3.10(d)(1)(iii)

9. Tank(s) are inspected weekly for:

   (A) ____ Corrosion or leaking of fixtures or seams - 373-3.10(d)(iv)

   (B) ____ Erosion or obvious signs of leakage (e.g., wet spots or dead vegetation) of the construction materials of, and the area immediately surrounding discharge confinement structures (e.g., dikes). 373-3.10(d)(v)

Indicate:		Indicate:	
X	Violations	X NA	Satisfactory Not Applicable

Ignitable or reactive wastes - 373-3.10(f)

10. ____ Ignitable or reactive waste is placed in a tank and the waste is stored, treated, rendered or mixed before or immediately after placement in the tank so that the resulting wastes, mixture or dissolution of material is no longer ignitable or reactive. — NA

11. ____ Ignitable and reactive waste is stored in a tank and the tank is used solely for emergencies. —

12. ____ Storage of ignitable or reactive waste in covered tanks complies with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks, contained in Tables 2-1 thru 2-6 of the "Flammable and Combustible Liquids Code, 1981." —

Incompatible Wastes - 373-3.10(g)

13. ____ Incompatible wastes, or incompatible wastes and materials must not be placed in the same tank unless 373-3.2(h)(2) is complied with. 373-3.10(g)(1) —

14. ____ Incompatible wastes must not be placed in an unwashed tank which previously held an incompatible waste or material unless 373-3.2(h)(2) is complied with. 373-3.10(g)(2) —

Special Requirements in sole source aquifer areas - 373-3.10(h)

15. ____ The base underlying the tank is free of cracks and is sufficiently impervious to contain leaks. NA

16. ____ The base is designed to drain or the tank is elevated to prevent contact with accumulated liquids. NA

17. ____ Containment system can contain at least 110 percent of tank volume. X

18. ____ Run-on into containment system is prevented or designed for. X

19. ____ Leaked waste or accumulated precipitation is timely removed to prevent possible overflow. X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

4. Manifest Records and Reporting

A. ___ It appears, from the available information, that there is a manifest copy available for each hazardous waste shipment off-site that has been made - 372.2(b)(5)(i). X

If "violation" checked or "don't know," please elaborate.

_____

_____

_____

B. Describe the approximate size of an average shipment made and how many shipments per month? ___

_____

_____

C. Each manifest (a representative sample) has the following information: - 372.2(b)(1); Appendix 30

		Generator	Transporter 1	Transporter 2	TSDF	
1.	Name of	___	___	___	___	X
2.	EPA ID No. of	___	___	___	___	X
3.	Mailing Address of	___	___	___	___	X
4.	Telephone No. of	___	___	___	___	X
5.	Manifest Document No.	___	___	___	___	X

6. ___ The proper USDOT description. X

7. X The appropriate X quantity, X container no. X container type, and X waste type by units of weight or volume.

8. ___ Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the USDOT and NYSDEC - 372.2(a)(4) and 372.2(a)(5) and 372.2(a)(6). X

9. ___ Signed copies of the manifest records have been retained at the facility for at least three years - 372.2(c)(1)(i) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

D. ___ There is written communication that the designated treatment, storage or disposal facility is an authorized treatment, storage or disposal facility for the particular wastes being offered for shipment and has capacity to accept the hazardous waste set forth on the manifest and will assure the ultimate disposal method is followed. 372.2(b)(2)(i) — X

E. ___ The generator must distribute copies of the manifest as specified on the manifest form - 372.2(b)(3) — X

F. International shipments - 372.5

(1) ___ EPA has been notified four weeks prior to shipment of hazardous waste destined for treatment, storage or disposal outside the United States - 372.5(b)(1) — NA

(2) ___ Delivery of the wastes has been confirmed within 90 days of acceptance of initial transporter - 372.5(b)(2) — |

(3) ___ The generator has identified the point of departure from the United States through which the waste must travel before entering a foreign country - 372.5(b)(3)(ii) — |

G. ___ Has complied with interstate shipments - 372.6 — X

H. ___ Has complied with shipments by rail or water (bulk) - 372.7 — NA

I. ___ Copies of all records have been kept for at least three years (e.g., annual reports, manifests, exception reports, sampling data) - 372.2(c)(1)(i), (ii), and (iii). — X

J. ___ All records required under this subdivision were furnished upon request, or made available at a reasonable time for inspection - 372.2(c)(1)(iv) — X

K. ___ The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 20 days ago: — X

___ If not, exception reports have been submitted covering these shipments - 372.2(c)(3) — X

L. ___ A generator annual report has been prepared and sent to the department. 372.2(c)(2) — NA

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

5. Personnel Training - 372.2(a)(8)(ii) and 373-3.2(g)

A. There is a: Records maintained in the Coney Island Facility Human Resources Dept. (not inspected)

___ written description of the job title for each position at the facility related to hazardous waste management and name of the employee filling each job - 373-3.2(g)(4)(i)

___ written job description for each position 373-3.2(g)(4)(ii)

___ written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management - 373-3.2(g)(4)(iii)

___ Records that document the training or job experience required 373-3.2(g)(4)(iv) has been given to and completed by facility personnel.

B. ___ The training program is directed by a person trained in hazardous waste management procedures and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. 373-3.2(g)(1)(i),(ii) and (iii). The components are:

(1) ___ Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;

(2) ___ Key perameters for automated waste feed cutoff systems;

(3) ___ Communications or alarm systems;

(4) ___ Response to fires and explosions;

(5) ___ Response to groundwater contamination incidents; and

(6) ___ Shutdown of operations.

C. ___ Facility personnel have successfully completed the program by the effective date of these regulations or six months after the date of their employment. 373-3.2(g)(2)

D. ___ Facility personnel have taken part in an annual review of the initial training required. 373-3.2(g)(3)

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

E. ___ Training records on current personnel have been kept permanently at the facility (until closure). 373-3.2(g)(5)

F. ___ Training records on former employees have been kept for at least three years from the date the employee last worked at a facility. 373-3.2(g)(5)

6. Preparedness and Prevention - 372.2(a)(8)(ii); 373-3.3

A. ___ The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.3(b) X

B. The facility must be equipped with the following (Check missing equipment if needed in this facility's particular operations.) - 373-3.3(c)

(1) ___ An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel; X

(2) ___ A device, such as a telephone or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire departments or state or local emergency response teams; X

(3) ___ Portable fire extinguishers, fire control equipment. X

(4) ___ Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems. X

C. ___ Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 373-3.3(d) X

D. ___ Personnel involved in hazardous waste operations have immediate access to an internal alarm or emergency communication device 373-3.3(e) X

E. ___ The facility has the required aisle space - 373-3.3(f) (Inspections should be able to be made of each drum and space should be sufficient to fight a fire). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

F. The facility owner or operator has made an attempt in good faith to make the following arrangements with local authorities, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations - 373-3.3(g)(1):

(1) ___ Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility; X

(2) ___ Where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to primary emergency authority; X

(3) ___ Agreements with government emergency response teams, emergency response contractors, and equipment suppliers; X

(4) ___ Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illness which could result from fires, explosions or releases at the facility; and X

(5) ___ Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record. NA

7. Contingency Plan and Emergency Procedures - 372.2(a)(8)(ii); 373-3.4

A. ___ The facility has a contingency plan or some other emergency plan which incorporates hazardous waste management. X

B. The following are included in the contingency plan - 373-3.4(c)

(1) ___ A description of actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water; X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2) ___ A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services; X

(3) ___ Names, addresses and phone numbers of all persons qualified to act as emergency coordinator; X

(4) ___ A list of all emergency equipment at the facility, and decontamination equipment, where this equipment is required; X

(5) ___ The location and the physical description of each item on the list, and a brief outline of its capabilities; X

(6) ___ An evacuation plan for facility personnel, where there is a possibility that evacuation could be necessary. X

C. ___ Copies of the contingency plan are maintained at the facility - 373-3.4(d)(1) X

D. ___ Copies of the contingency plan have been submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services - 373-3.4(d)(2) X

E. ___ The contingency plan has been amended - 373-3.4(e) NA

F. ___ There was at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures - 373-3.4(f) X

G. ___ During a past emergency situation the emergency coordinator (or his designee when the emergency coordinator is not on call) immediately activated emergency procedures - 373-3.4(g) NA

The following was done:

(1) ___ Activated internal facility alarms or communication systems;

(2) ___ Notified appropriate state or local agencies;

(3) ___ Immediately identified the character, extent, exact source, amount and areal extent of any released materials;

(4) ___ The emergency coordinator assessed possible hazardous to human health and the environment;

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(5) ___ The emergency coordinator, after determining that the facility had a release, fire or explosion which could threaten human health or the environment outside the facility, reported his findings; NA

(6) ___ During the emergency, the emergency coordinator took all reasonable measures necessary to ensure that fire, explosions and releases do not occur, recur or spread to other hazardous waste;

(7) ___ The emergency coordinator monitored for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, where appropriate during the facility's response to the emergency;

(8) ___ The emergency coordinator provided for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire or explosion at the facility;

(9) ___ The emergency coordinator ensured that in the affected area no waste that may be incompatible with the released material was treated, stored or disposed of prior to cleanup procedures being completed;

(10) ___ The emergency coordinator ensured that all emergency equipment listed in the contingency plan was cleaned and fitted for its intended use before operations were resumed;

(11) ___ The owner or operator notified the Commissioner that the facility is in compliance with Part 373-3.4(g)(8) before operations were resumed in the affected areas of the facility;

(12) ___ The owner or operator noted in the operating record the time, date and details of the incident that required implementation of the contingency plan;

(13) ___ The owner or operator submitted a complete written report on the incident within 15 days after the incident occurred.

AWM | ESD
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August 28, 1987

U.S. Environmental Protection Agency
Region II
Room 907
26 Federal Plaza
New York, New York 10007

ATTN: Ms. Wanda ~~Cas~~vasquez
Freedom of Information Officer

Dear Ms. ~~Cas~~vasquez:

This is a request for information pursuant to the Freedom of Information Act, 5 U.S.C. §552, and 40 C.F.R. Part 2. This firm represents the Brooklyn Union Gas Company with respect to various matters concerning environmental regulation. In April 1987 U.S.E.P.A. Region II personnel conducted inspections of Brooklyn Union's facilities. It is our understanding that the scope of that inspection concerned compliance with the Resource Conservation and Recovery Act (RCRA) and the Toxic Substances Control Act (TSCA).

Your assistance is requested in securing copies of the inspection report or reports prepared followed the April 1987 inspections. If no report is currently available, please advise if one is in preparation and the approximate date it would be available for inspection.

If you require any further information please contact me at (212) 715-8220. We will of course pay any reasonable charges incurred in satisfying this request. Please contact the undersigned when the requested materials are available so that we can arrange to have them picked up by messenger or shipped by prepaid Express Mail or Federal Express.

Very truly yours,

SEP 1 9 45 AM '87

Jon R. Mostel

JRM:pw

cc: L. H. Liebs, Brooklyn Union Gas